

ENVIRONMENTAL INDICATOR (EI) RCRIS CODE (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: NORTHWEST INDUSTRIES (NWI)  
Facility Address: 125 34th Avenue, SW., Albany, OR 973321  
Facility EPA ID #: ORD 009020835

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

- ☒ **If yes** - check here and continue with #2 below.
- ☐ **If no** - re-evaluate existing data, or
- ☐ **If data are not available**, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Is **groundwater** known or reasonably suspected to be “**contaminated**”<sup>1</sup> above appropriately protective “levels” (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- ☒ **If yes** - continue after identifying key contaminants, citing appropriate “levels,” and referencing supporting documentation.
- ☐ **If no** - skip to #8 and enter “YE” status code, after citing appropriate “levels,” and referencing supporting documentation to demonstrate that groundwater is not “contaminated.”
- ☐ **If unknown** - skip to #8 and enter “IN” status code.

**Rationale and Reference(s):**

The primary contaminants of concern are VOCs, particularly TCE. Soil and groundwater investigations have been conducted at the site under DEQ orders since 1989 (Stipulated and Final Order, August 1989; Mutual Agreement Order, May 1995; and Order on Consent, December 1997). A network of over 25 on- and off-site wells is being used to define the nature and extent of the groundwater contaminant plume.

- The highest concentration of TCE detected in on-site monitoring wells installed the Upper Silt is 850 µg/L (MW-2A, September 1991).
- The highest concentration of TCE detected in on-site monitoring wells installed in the upper and lower gravel zones (Zone A/B) is 21,000 µg/L (MW1-B, December 1991, March 1992).
- The highest concentration of TCE detected in off-site wells installed in Zone C is 74 µg/L (Oremet production well #10, December 2000).

The nature and extent of the on-site plume is fully characterized. The off-site plume is still under investigation. The VOC contamination appears to have moved from the shallow to the deeper zones as it migrates toward the Oremet site. It also appears that the groundwater pump and treat system installed along the NWI property line has successfully contained the plume on-site, and there is no longer a significant contribution to the off-site contamination.

The only surface water with the boundaries of the locality of the facility (the area in which contamination, if uncontrolled, may reasonably be expected to migrate) is the Albany-Santiam Canal. Canal level and groundwater monitoring have been conducted at the site, since September 1990. These data have consistently shown that the canal water level is above the groundwater level.

**Footnotes:**

<sup>1</sup>. “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate “levels” (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

- ☒ **If yes**, continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>).
- ☐ **If no**, (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) - skip to #8 and enter "NO" status code, after providing an explanation.
- ☐ **If unknown** - skip to #8 and enter "IN" status code.

**Rationale and Reference(s):**

The interim corrective measures included installing a groundwater pump and treat system which has been in operation since August 1996.

The system consists of seven groundwater recovery wells and an aboveground water treatment system. The groundwater recovery system operates primarily to control groundwater flow beneath the site and to minimize off-site migration of dissolved VOCs.

The December 31, 1999, Remedial Investigation Reports assessed effectiveness of the groundwater recovery system and concluded that the system is capturing the contaminant plume in both hydrogeologic units of concern. (See also the December 11, 2000, Annual ICM and SVE System Performance and Semi-Annual Groundwater Monitoring Report.)

**Footnotes:**

<sup>2</sup> "Existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

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**If yes** - continue after identifying potentially affected surface water bodies.

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**If no** - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

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**If unknown** - skip to #8 and enter "IN" status code.

**Rationale and Reference(s):**

The only surface water within the lateral boundaries of the locality of the facility is the Albany-Santiam Canal. Canal level and groundwater monitoring have been conducted at the site since September 1990. These data have consistently shown that the canal water level is above the groundwater level. Therefore, there are no affected surface water bodies within the locality of the facility (See Section 6.4, December 31, 1999, "Remedial Investigation Report" prepared by Hart Crouser, Inc.).

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5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or ecosystems at these concentrations)?

- ☐ **If yes** - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting:  
(1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and (2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or ecosystem.
- ☐ **If no** - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: (1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and (2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
- ☐ **If unknown** - enter “IN” status code in #8.

**Rationale and Reference(s):**

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**Footnotes:**

<sup>3</sup>. As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or ecosystems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

☐ **If yes** - continue after either: (1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and ecosystems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR (2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and ecosystems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment “levels,” as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

☐ **If no** - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or ecosystems.

☐ **If unknown** - skip to 8 and enter “IN” status code.

**Rationale and Reference(s):**

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**Footnotes:**

<sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or ecosystems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

☒ **If yes** - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

☐ **If no** - enter "NO" status code in #8.

☐ **If unknown** - enter "IN" status code in #8.

**Rationale and Reference(s):**

The Order dated 12/19/97, requires groundwater monitoring and assessment .  
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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ **YE** - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **NORTHWEST INDUSTRIES (NWI)** facility, EPA ID **#ORD 009020835**, located at **125 34th Avenue, SW., Albany, OR 97321**. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

☐ **NO** - Unacceptable migration of contaminated groundwater is observed or expected.

☐ **IN** - More information is needed to make a determination.

**Completed By:**

\_\_\_\_\_  
(Signature)

5/4/01  
(Date)

Barb Puchy  
(Print Name)

Hazardous Waste Specialist  
(Title)

**Supervisor:**

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

Dave Rozell  
(Print Name)

Manager, Hazardous Waste Policy  
and Program Development (Title)

Oregon Department of Environmental Quality  
(EPA Region or State)

**Locations where References may be found:**

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